

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 6:21-CR-43
v.	§	JUDGE JDK/KNM
	§	
LOIS BOYD (01)	§	

**FACTUAL BASIS**

Investigation by the United States Secret Service (USSS) disclosed the following facts that establish that I, the defendant, Lois Boyd, violated 18 U.S.C. § 1952. I accept the following factual basis as true and correct:

1. From on or about August 12, 2020, through on or about August 13, 2020, in the Eastern District of Texas, and elsewhere, aided and abetted by Manik Mehtani and others, I traveled in interstate commerce and used a facility in interstate commerce, namely the telephone, with the intent to distribute the proceeds of unlawful activity and to otherwise promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, money laundering, an act indictable under section 1956 or 1957 of Title 18, and thereafter performed and attempted to perform an act to distribute the proceeds of unlawful activity and to otherwise promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity.

2. On August 12, 2020, and August 13, 2020, I traveled from Virginia to Texas.

3. On the same days, I used the telephone.

4. The interstate travel and use of the telephone was done with the intent to distribute the proceeds of unlawful activity and to carry on an unlawful activity, namely money laundering, in violation of 18 U.S.C. §§ 1956 and 1957.

5. On August 13, 2020, subsequent to the act of travel or use of the telephone and in order to distribute the proceeds of unlawful activity and to otherwise carry on the unlawful activity, along with Manik Mehtani and others, I knowingly and willfully attempted to exchange \$100,000 in U.S. Currency into cryptocurrency.

6. I attempted to make the exchange with intent to distribute the proceeds of unlawful activity and to otherwise carry on the unlawful activity.

7. The criminal proceeds which we brought to Texas as part of the offense were \$446,188.00, and that is the appropriate amount should the Court order forfeiture.

8. I acknowledge that these acts constitute a violation of 18 U.S.C. §§ 1952 and 2 (Travel Act and Aiding and Abetting).

I hereby stipulate that the facts described above are true and correct and accept them as the uncontroverted facts of this case.

Dated: April 26 2022

Lois Boyd  
Defendant

**Defendant's Counsel's Signature and Acknowledgment:**

I have read this Factual Basis and the Plea Agreement in this matter and have reviewed them with my client, Lois Boyd. Based upon my discussions with my client, I am satisfied that he understands the terms and effects of the Factual Basis and the Plea Agreement and that he is signing this Factual Basis voluntarily.

Dated: \_\_\_\_\_

5/4/22

\_\_\_\_\_  
Craig Bass  
Attorney for Defendant